

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA

Case No. 3:13-CR-00087-BR

v.

[STIPULATED] PROTECTIVE ORDER

DIALLO J. GASTON,

Defendant.

Upon the motion of the government, defendant having no objection, and good cause appearing it is hereby ORDERED pursuant to Rule 16 of the Federal Rules of Criminal Procedure that the following protective order shall govern the disclosure and use of discovery in this case.

PROTECTIVE ORDER

To protect the identity and personal information of the alleged minor sex trafficking victim, as well as any personal information about non-law enforcement witnesses, the following protective order shall govern the use and disclosure of materials containing such information by the defense:

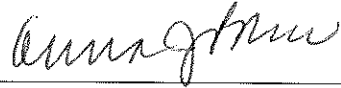
- 1) The government may provide the defendant with unredacted versions of the discovery in this case;

- 2) Defense counsel shall only use the discovery related to this case, as necessary in investigating and litigating his client's defense;
- 3) To the extent defense counsel need to reference, or attach to any pleading, the contents of any discovery that reference the alleged minor victim or non-law enforcement personnel, prior to trial, they shall file the same under seal;
- 4) Except as noted below, defense counsel shall not provide copies of any of the protected and unredacted discovery to anyone other than his investigators, legal support staff, and experts as necessary in the preparation of his client's defense;
- 5) To prevent dissemination of confidential or protected information related to the alleged minor sex trafficking victim and personal information about other non-law enforcement individuals, counsel **shall not** provide his client with any discovery that identifies the alleged victim, including by name or other personal identifiers. Additionally, counsel shall not allow his client to make or receive copies of any of these materials. Defense counsel may, however, show the materials to, and discuss their substance with, his client;
- 6) All persons to whom any such discovery is provided, which may identify the alleged victim and/or non-law enforcement individuals, shall be advised that the materials are under a protective order and may not be further disclosed or disseminated except as stated above; and,
- 7) At the conclusion of the proceedings, all reports and materials containing references to the alleged minor sex trafficking victim and/or identifiers of non-law

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enforcement individuals shall either be returned to the government or be
maintained in the files of defense counsel.

DATED this 15th day of May 2013.



HONORABLE ANNA J. BROWN
United States District Court Judge

Presented by:

S. AMANDA MARSHALL, OSB #95347
United States Attorney
District of Oregon

/s/ Scott M. Kerin

SCOTT M. KERIN, OSB #96512
Assistant United States Attorney